

Remarks:

Claim Rejections – 35 USC 102

Claims 2-6 were rejected under 35 USC 102(b) in view of Ham.

The examiner argues that Ham teaches in figure 7 a method that includes providing a p-n junction diode 40,42 in the p-well that is forward biased during normal operation.

It is respectfully submitted that there is no forward biased p-n junction anywhere in Ham. In fact the only biased junctions are p-well/n-well which is reverse biased (n-well connected to VDD and p-well connected to VSS). Also, a reverse biased junction exists between p+ region 48 (tied to I/O pad) and n-well (tied to the higher voltage VDD). This is described in column 4, lines 59-67 and shown in Figure 8 as reverse biased diode 56. Similarly, there is reverse biased diode between the p-well (tied to VSS) and n+ region 44 (tied to the I/O pad). This is shown in Figure 8 as reverse biased diode 54).

(Applicant wishes to point out a misstatement inadvertently made regarding Ham in response to the previous office action: the regions 40, 42 are both tied to VSS and therefore the p-n junctions across these two regions is not biased. Similarly the regions 50, 52 are both tied to VDD and therefore the junction between them is also not biased.) In any event, as discussed above, Ham has no forward biased junctions.

In contrast to Ham, the present application has two p-n junctions in the p-well, namely (p+ region 420/n+ region 422) and (p+ region 424/n+ region 426) (see page 5, lines 36-38). The electric field across the structure between drain 406, 408 and source, biases the two diodes in a forward direction to provide the additional current path when they break down at approximately 1V (see page 6, lines 12-14).

In view of these facts, it is respectfully requested that the final rejection be withdrawn and the claims be allowed.

Respectfully Submitted,

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